

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

WEST PUBLISHING CORPORATION,	X	
	:	
Plaintiff / Counterclaim-		
Defendant,	:	
v.	:	
LEGALEASE SOLUTIONS, LLC,		Civ. No. 18-CV-01445
	:	(DSD/ECW)
Defendant /Counterclaim-		
Plaintiff.	:	
	:	
	X	

DECLARATION OF MARA A. O'MALLEY

Mara A. O'Malley, under pains and penalty of perjury, states as follows:

1. I am an attorney with the law firm of Manatt, Phelps & Phillips, LLP, and represent Plaintiff and Counterclaim-Defendant West Publishing Corporation ("West") in the above-captioned matter. I offer this Declaration based on my personal knowledge and in support of West's Motion to Compel Production of Documents in Response to Subpoena *Duces Tecum*.

2. Attached hereto as exhibits are true and correct copies of the following documents:

Exhibit A	Subpoena to ROSS Intelligence, Inc. (issued June 14, 2019)
Exhibit B	Letter from Peter Lancaster, counsel for ROSS Intelligence, Inc., to Scott Lashway, counsel for West (June 28, 2019)
Exhibit C	Letter from Scott Lashway, counsel for West, to Peter Lancaster,

	counsel for ROSS Intelligence, Inc. (August 12, 2019)
Exhibit D	Email from Peter Lancaster, to Scott Lashway and Mara O'Malley, counsel for West, with copy to Kate Johnson, counsel for ROSS Intelligence, Inc. (August 14, 2019)
Exhibit E	ROSS Intelligence, Inc.'s Privilege Log (produced September 11, 2019)
Exhibit F	ROSS Intelligence, Inc.'s Redaction Log (produced September 11, 2019)
Exhibit G	Copy of LinkedIn profile of Tomas van der Heijden (site last visited September 18, 2019)
Exhibit H	Email from Kate Johnson to Scott Lashway, Mara O'Malley, and Lora Friedemann, counsel for West, with copy to Peter Lancaster (September 16, 2019)
Exhibit I	Email from Kate Johnson to Scott Lashway and Peter Lancaster with copy to Mara O'Malley and Lora Friedemann (September 6, 2019)
Exhibit J	Email from "jimoh@rossintelligence.com" to "tomas@rossintelligence.com" dated November 3, 2019 (produced by ROSS as ROSS00055079–ROSS00055081) (filed under seal pursuant to Dkt. 28)
Exhibit K	Email from "jimoh@rossintelligence.com" to "tomas@rossintelligence.com" dated November 10, 2019 (produced by ROSS as ROSS00055471–ROSS00055473) (filed under seal pursuant to Dkt. 28)

Dated: September 24, 2019


Mara A. O'Malley